



Brussels, 23 June 2026

10th meeting of the Commission Expert Group on Machinery

27 April 2026, 9:30 – 17:30, CCAB Brussels (room AB-0A)

DRAFT meeting minutes

Documents can be downloaded from the CIRCABC group “Commission Expert Group on Machinery (E03676)”

<https://circabc.europa.eu/ui/group/126cd31c-cf60-47b6-8f9c-5ab34b6d4b2f/library/94791da7-0aa3-4734-a8cb-e32cf4a91cf1>

1. Approval of the draft Agenda

The chairperson opened the meeting and welcomed everyone. The draft agenda, which had been circulated via CIRCABC, was approved. A slight reordering of the running order was agreed in support of the various speakers.

2. Approval of the minutes of the 9th MEG meeting

The minutes were circulated in February 2026. The chairperson noted that no comments were received. The minutes of the 9th meeting were subsequently approved.

3. Machinery Regulation (EU) 2023/1230

3.1. Accident data analysis – update about study and survey launch

CSIL, the contractor conducting the analysis of accident data related to high-risk machinery, presented an update on the study commissioned by the Commission. The presentation outlined the study’s purpose and its four key analytical components: labour market and accident data collection, the operationalisation of risk indicators, economic impact assessment, and the mapping of machinery categories according to risk trends.

Data was sourced from Member States (under Article 6(9) of the Machinery Regulation), ESAW/PRODCOM databases, the EU Labour Force Survey, stakeholder interviews, and questionnaires to notified bodies and manufacturers. Challenges – such as inconsistent national data, limited details, and varying reporting methods – were addressed through harmonisation, complementary datasets, and standardised approaches.

COM invited participants to distribute the survey, ongoing until May 2026, to manufacturers and notified bodies.

During the discussion, stakeholders asked whether the study might lead to changes in Annex I of the Machinery Regulation (MR), arguing that any potential additions should be balanced by a review of existing categories for possible removal. They also highlighted the need to distinguish between workplace and non-workplace incidents in the data and stressed the importance of investigating the root cause of each accident, specifically, whether the machine itself was at fault.

Member States agreed with the latter and also suggested a more detailed examination of machinery types frequently linked to accidents and asked to this aim whether advanced tools, such as AI, had been applied in the analysis. A request was made for clarity on the publication timeline for the final report.

COM responded that the currently available data used as the base of the analysis for the study, has a focus on occupational accidents and accidents at the workplace. Efforts were made to incorporate data with a focus on all accidents, including non-occupational accidents, through the use of the European Injury Database (EU-IDB), but incompatibilities in data structure precluded its use. While acknowledging data shortcomings, it was emphasised that future improvements – including better reporting standards and integrated datasets – would be explored. Any consideration of amendments to Annex I of the MR would follow the standard consultation process, ensuring Member States have the opportunity to contribute before any Decision is fully implemented.

The report about accident data analysis will be presented at the next Expert Group meeting.

3.2. Update on the ongoing gap-analysis concerning current harmonised standards under the Machinery Directive, that are considered to be re-cited under the new Machinery Regulation

COM explained that the gap analysis for harmonised standards under the Machinery Regulation (MR) was nearly completed, with around 670 standards being reviewed and referenced. Restrictions to the re-cited harmonised standards will be added as necessary, in particular for new or updated EHSRs (such as AI safety requirements). CEN-CENELEC Technical Committees and HAS consultants are finalising the work.

Stakeholders called for a pragmatic approach to resolve discrepancies between ESOs and HAS consultants, suggesting that disagreements with HAS consultants should not delay progress. They proposed adopting the most restrictive option amongst discrepancies to expedite the process.

Concerns were raised about partial coverage of MR requirements by existing standards, especially for Cyber-safety and AI, where guidance is still pending. It was confirmed that new Cyber-safety requirements may necessitate Notified Body assessment, when harmonised standards are not fully

applied. Also, Annex I, Part B machinery may require Notified Body involvement when they have digital elements that are not covered by an appropriate future harmonised standard.

CEN-CENELEC noted that Type C standards already cover all Annex IV Machinery Directive (MD) requirements and that new standards are being developed to address additional MR obligations, including Cyber-safety risks.

Existing EC type-examination certificates issued under MD remain valid until their expiring date (Article 52 of the MR). However, compliance needs to be ensured with the new or updated MR requirements (e.g., AI- or Cyber-safety) if applicable to the concerned product. Such machinery or related products with existing MD EC type-examination certificates, but that require MR type-examination for new or updated EHSR, can rely on supplementary type-examination certificates obtained through Notified Body assessments, covering only Cyber-safety, AI-safety or both. For product categories that fall within Annex I, Part A, to the MR, Notified Body involvement is obligatory. For product categories that fall within Annex I, Part B, compliance can be demonstrated via self-declaration if indeed updated or supplementary harmonised standards (when available and achieving that all relevant requirements are covered) are fully applied. If that is not the case, Notified Body involvement is obligatory.

3.3. Citation of new harmonised standards under the Machinery Regulation

COM gave an oral update and outlook concerning the upcoming first Commission Implementing Decision under the MR. Its publication is a matter of priority.

3.4. Progress report by the Editorial Group on drafting the Guide to application of the new Machinery Regulation

The Editorial Group presented an update on the Guide to the Machinery Regulation, outlining progress across five subgroups (covering topics like overall fitness checks, vibrations, AI, and digital documentation). Key discussion points were highlighted, and the MEG was asked to provide input on outstanding questions. The presentation is available on CIRCABC.

Once finalised, the MEG will approve the guide following a writing consultation, even chapter by chapter as soon available, after which it will be published.

During the discussion, questions were posed about the guide's legal significance, with clarification sought on whether it could impose binding requirements or merely serve as supportive guidance. COM confirmed that the guide is purely supportive and non-binding. It was clarified that the guide would first be published on the Commission's Europa website.

Following a comment to include certain information about specific standards to be referenced, suggestions were made to limit such standard references, if any, to Type A and B only, excluding Type C to avoid excessive detail. Finally, it was also suggested to cover certain interactions with Non-Road Mobile Machinery (NRMM) legislation. In conclusion, it was recalled that references to standards in the guide should be avoided, unless absolutely critical. It was emphasised that Cyber-safety and AI should remain the primary focus, with NRMM considered a secondary priority.

There were questions on safety-critical related digital instructions, which must remain in paper format. After a discussion, stakeholders agreed that manufacturers should decide on instruction formats based on risk assessments, rather than rigid rules set out in the guide.

3.5. Mobile machinery's seating and restraint system

ETUI introduced a discussion paper, focusing on EHSR 3.2.2 and raising concerns about the ambiguity in seat belt requirements under the Machinery Regulation (MR). ETUI questioned whether the MR application guide could clarify this, given its explanatory nature.

Some manufacturers representative confirmed that their sector's machines already comply with seat belt standards, as mandated by existing harmonised standards. Member States highlighted a potential discrepancy between MR and MD, warning that while the Editorial Group could note this as an optional interpretation, courts would ultimately follow the legal text. Amending the legal text would resolve the ambiguity while aligning the discussion with NRMM requirements. It was noted that machines used on roads should be fitted with three-point seat belts, although it was noted that exceptions might be necessary for certain machinery.

COM clarified that the MR proposal had intended seat belts to be mandatory, instead of allowing for alternatives such as a padded interior. As a short-term solution, the COM advised to follow existing harmonised standards for mobile machinery, since they require installation of seat belts, representing the current state of the art. However, the COM noted the point for further internal reflection on potential long-term actions.

4. Regulation (EU) 2025/14 on approval and market surveillance of non-road mobile machinery circulating on public roads

4.1. Report on the Working Group on Agricultural Tractors and Mobile Machinery (WGATM)

COM provided an oral update on the renewed WGATM Expert Group, directing attendees to review the shared link for details and join the NRMM group for further discussion, if pertinent.

4.2. Secondary legislation with detailed provisions – draft Delegated Act and future Implementing Act

COM provided a brief oral explanation about the first draft Delegated Act on NRMM, containing detailed provisions. COM will analyse the comments received, and ad hoc drafting meetings with interested stakeholders and Member States will follow to refine the text of all the Annexes covering the 24 individual safety topics, plus 3 arrangements on testing and conformity of production procedures, i.e. a total 27 Annexes.

5. Standardisation activities

5.1. Update from CEN-CENELEC

CEN-CENELEC provided an update on machinery standardisation, noting ~800 harmonised standards under the MD, with 49% being EN ISO/IEC and 51% EN-only. 21 new citations were published in March 2026, with ~67 more expected soon. The transition from MD to MR is progressing, with 113 standards already registered for completion linked to the Regulation.

Gap analyses totalled 665 submissions starting in February 2025, with a second batch of 60–80 standards pending, and a third smaller batch due by Q3 2026.

The upcoming Cyber-safety harmonised standard (protection against corruption draft EN 50742) addressing ESHRs 1.1.9 and 1.2.1, is a top priority, with public inquiry completed in February 2026 and publication targeted for October 2026. Efforts are underway to expedite citation in advance of January 2027.

The significant update of the Annex Z template was presented. It will require a full listing of all ESHRs, aiming to increase clarity. The new template, developed with COM, will be made available to the Technical Committees of CEN-CENELEC.

The Commission Implementing Decision (EU) 2026/546 was published earlier in 2026, and the next batch of citations were in preparation. After this, any unpublished standards will have to shift to MR.

5.2. Status of publication of the references in the Official Journal

COM provided an update on the publication of harmonised standards in the Official Journal since the last MEG meeting. A timeline for the final publications under the MD was also outlined. Further details on new or amended standards are available via the provided link to Commission Implementing Decision (EU) 2026/546 in the OJ.

5.3. Revision of the Standardisation Regulation (EU) No 1025/2012

COM provided an overview of the ongoing revision of the Standardisation Regulation, summarising the impact assessment findings and the stakeholder responses received. A draft Supporting Working Document (SWD) was scheduled for 20 May for assessment by the regulatory scrutiny board, with the final legislative proposal expected in Q3 2026. This revision forms part of a coordinated package (the European Product Act), running alongside updates to the New Legislative Framework (NLF).

The evaluation identified several critical areas for improvement, including the need to accelerate the publication of references of harmonised standards, enhance SME participation in their development, and improve accessibility. It also called for greater clarity on the legal status of harmonised standards, a stronger EU presence in international standardisation bodies, and better alignment of standards with EU policy objectives. To address these challenges, some ideas are proposed such as digitising the standardisation process and optimising legal procedures to speed up the adoption of Commission Decisions.

6. Formal Objections to harmonised standards

6.1. Status of publication of Formal Objections in the Official Journal

COM provided an oral update on the publication in the OJ regarding the restriction for gardening shredders and chippers (harmonised standard EN 50434:2014), noting that a minor correction had been made to the restriction text under point 5.3 of Commission Implementing Decision (EU) 2026/546, with no questions or comments raised by attendees.

6.2. Formal Objection against EN ISO 5395-3:2013 as amended by EN ISO 5395-3:2013/A1:2017 and EN ISO 5395-3:2013/A2:2018 on “Garden equipment – Safety requirements”

France introduced the formal objection against harmonised standard EN ISO 5395-3:2013 (as amended) on ride-on lawnmowers, citing risks of overturning/rollover, supported by accident data. Member states’ interventions emphasised safety gaps, while supporting stricter stability/manoeuvrability measures, some of them calling for further dialogue. Some stakeholders noted unresolved solutions were still being debated. COM concluded to keep the topic on the agenda of the next meeting. All related documents are on CIRCABC.

7. Market Surveillance activities

7.1. Administrative Cooperation Group on Machinery – reporting

The Administrative Cooperation Group on Machinery (AdCo) chair, Stefano Boy — still supported by outgoing chair Alwin Verdaasdonk, who was thanked for his valuable work to date — presented recent and future activities (including discussions on EN 280-1, e-steps, and e-bikes) and confirmed that all pending agenda items would be carried over to the next meeting, scheduled for 18–19 November in Rome, Italy.

7.2. Revision of the Market Surveillance Regulation (EU) 2019/1020

COM presented the ongoing revision of the Market Surveillance Regulation (MSR), a key component of the EU Single Market Strategy, aimed at enhancing competitiveness within evolving political and economic challenges. The current framework faces three critical inadequacies: outdated rules that fail to prevent non-compliant products from entering the market, an irregular playing field that disadvantages law-abiding European businesses, and insufficient enforcement capacity due to under-resourced market surveillance authorities. The Commission is conducting an impact assessment to determine the options to update to the regulation. This revision is being carried out in parallel with amendments to the NLF – Regulation 765/2008, Regulation 2019/1020, and Decision 768/2008 – and Standardisation Regulation. A targeted stakeholder survey was opened to gather input, and the Commission is currently analysing the collected data. The legislative proposal is planned for Q3 2026.

8. Notified Bodies' activities

The representatives of the European Coordination of Notified Bodies for Machinery horizontal committee CNB-MA HC provided details of their team, activities and RfUs approved at the 60th CNB-MA HC meeting.

9. Common position of Notified Bodies on the Recommendations for Use

9.1. Introduction and Endorsement of the Recommendations for Use approved at the 60th Notified Bodies Machinery Coordination Group meeting

By consensus, the following RfUs were agreed to be referenced from the Europa website:

1) CNB/M/00.301 Rev 04 related to MR	2) CNB/M/00.503 Rev 03 related to MR
3) CNB/M/03.192 Rev 06 related to MD	4) CNB/M/03.192 Rev 07 related to MR
5) CNB/M/03.194 Rev 07 related to MD	6) CNB/M/03.194 Rev 08 related to MR
7) CNB/M/04.040 Rev 11 related to MD	8) CNB/M/04.040 Rev 12 related to MR
9) CNB/M/04.076 Rev 08 related to MD	10) CNB/M/04.076 Rev 09 related to MR
11) CNB/M/04.085 Rev 12 related to MD	12) CNB/M/04.085 Rev 13 related to MR
13) CNB/M/04.086 Rev 09 related to MD	14) CNB/M/04.086 Rev 10 related to MR
15) CNB/M/04.087 Rev 08 related to MD	16) CNB/M/04.087 Rev 09 related to MR

CNB/M/00.001 was not subject to formal endorsement, as it concerns purely administrative information.

9.2. Update concerning Recommendations for Use under the Machinery Regulation

The CNB-MA HC has updated its recommendations template to clearly distinguish between guidance for the MD and the MR and modernised outdated wording and use the name. The Coordination Group is trying to update the whole set of recommendations for use focusing on MR.

10. Questions and discussion on standards

Concerning the status of ongoing work on the revision of ISO 12100:2010, France presented their discussion paper. The revision of the ISO 12100 standard appears to be incompatible with a specific requirement in the MR, mandating physical protection barriers, whereas the new draft ISO standard would allow alternative solutions where fixed guards and interlocking guards are not practical.

During the debate, while some arguments were made that physical guards should not be the only compliant solution, others emphasised the need to support the MR's safety objectives, particularly in relation to mechanical hazard prevention under ESHR 1.3.8.

The need for improvement and alignment of the draft ISO standard was overall agreed.

11. Any other business

11.1. Revision of the New Legislative Framework (NLF)

Attendees were referred to points 5.3 and 7.2 of the meeting for the relevant updates on the revision of the New Legislative Framework (NLF), where the matter has been addressed.

11.2. Digital Product Passport (DPP)

COM outlined the Digital Product Passport (DPP), describing it as a digital container accessible via QR code, designed to centralise product-related information as mandated by sector-specific EU legislation. Originating from the Ecodesign for Sustainable Products Regulation (ESPR), the DPP is already a requirement in at least five regulatory acts, including the Battery Regulation. Implementation will rely on delegated acts — primarily addressing technical aspects Ensuring interoperability across supply chains — with CEN-CENELEC supporting standardisation, expected to be finalised by Q2 2026.

During the Q&A, key clarifications emerged:

- Access for Market Surveillance Authorities (MSAs) and public administrations will depend on sectoral legislation—it is not automatic but must be explicitly provided for in the relevant legal acts.
- The DPP is a flexible tool; while it could theoretically include technical files (e.g., for machinery), concerns were raised about protecting sensitive project data. COM emphasised that legislators determine what information must be included.
- The DPP is not a communication platform but purely an information repository, with no built-in mechanism for direct exchange between parties.
- A single QR code may grant tiered access to different documents: some products might have mandated or may have mandated different data carriers.

11.3. Update about Commission omnibus proposals

COM provided an oral update on the progress of its various omnibus proposals, saying numerous queries were received regarding their scope and implications. COM clarified that discussions are currently underway between the European Parliament and the Council, and any concerns or proposed amendments – such as those relating to "direct access" provisions – should be directed to these institutions as part of the legislative process.

COM reiterated its commitment to avoiding unnecessary burdens and confirmed it would intervene in line with this principle during the ongoing negotiations.

11.4. Reporting requirements under the Outdoor Noise Directive 2000/14/EC

COM gave oral clarification that – following the 2024 amendment (Directive (EU) 2024/2839) – it is no longer necessary for manufacturers to send hard-copies of the EC Declaration of Conformity with the noise measurement values to COM.

11.5. Draft Commission guidance on the Cyber Resilience Act

COM delivered a presentation on its recently published initiative: the draft guidance on the Cyber Resilience Act (CRA). The guidance aims to clarify obligations for manufacturers, developers, and other stakeholders, fostering a consistent and harmonised approach to compliance across the EU. Following an extensive public consultation, the Commission received over 250 feedback submissions, which are currently under analysis to refine the document. The finalised guidance is expected to be published in summer of 2026.

11.6. Application date of Cyber-safety related provisions in Machinery Regulation

COM provided a brief overview of the position papers received, many of which called for a delay in the implementation of cyber-safety provisions (ESHR 1.1.9 and 1.2.1) to ensure alignment with the Cyber Resilience Act (CRA). The Commission clarified that it is closely monitoring the trilogue negotiations between the Council and Parliament on two omnibus and, at present, no delay is foreseen to be endorsed. COM is in parallel prioritising the development of harmonised standards capable of addressing these Essential Safety and Health Requirements (ESHRs) effectively.

A manufacturers' representative acknowledged the Commission's approach but suggested that contingency planning (a "Plan B") might be prudent in case of unforeseen delays or challenges. The Commission took note of this suggestion.

11.7. Agricultural GPS equipment anti-theft and software update integrity requirements

Due to lack of time, this point will be presented at the next meeting. Delegates were requested to take note and to prepare questions and comments to be discussed at the next MEG meeting.

The next MEG meeting is tentatively scheduled to be held online on 22 October 2026

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